

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM BRANCH : CIVIL No.1: CV-00-1728
Plaintiff :
V. : (Judge ~~conners~~)
Mr. RUSSIAN, et., al. :
Defendant :

attn:

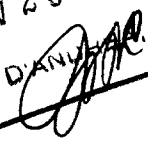
P.O. Box 983
Harrisburg Pa 17108 REQUEST FOR INTERROGATORIES SET # 1

THIS IS A REQUEST FOR DISCOVERY IN THE FORM OF INTERROGATOR
PER F.R.C.P. RULE 33 THEY ARE REQUIRED TO BE GIVEN UNDER OATH PER
RULE 33(b)(1). ALL ANSWERS ARE TO BE BY RACE, COMPLETER'S AND NONE
COMPLETER'S OF THE SEX OFFENDER'S PROGRAM AND PAROLED & NOT PAROLED

QUESTIONS: APPLY TO THE YEARS OF 1993 TO DATE
PAROLE STATISTICS

1) HOW MANY INMATES IN THE WHOLE STATE ARE SEX OFFENDERS LIST
BY SEPERATE STATE PRISON.

<u>PRISON</u>	WHITE / BLACK	<u>COMPLETER'S</u>	<u>NONE COMPLETER'S</u>
		W / B	W / B

FILED
HARRISBURG PA
NOV 26 2003
MARY E. D'AMICO, CLERK
Per 

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QUESTION:
cont. 1)

<u>PRISON</u>	<u>WHITE / BLACK</u>	<u>COMPLETER'S</u>	<u>NONE_COMPLETER'S</u>
		<u>W / B</u>	<u>W / B</u>

<u>TOTALS</u>	<u>-----</u>	<u>-----</u>	<u>-----</u>	<u>-----</u>	<u>-----</u>
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2)HOW MANY ARE PAROLED AND THOSE NOT PAROLED BY AND BY S.O.P.
COMPLETION.

<u>PRISON</u>	<u>PAROLED</u>	<u>N/PAROLED</u>	<u>COMPLETER'S</u>	<u>N/COMPLETER'S</u>
	<u>W / B</u>	<u>W / B</u>	<u>W / B</u>	<u>W / B</u>

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QUESTION:

cont. 2)

PRISON

PAROLED N/PAROLED
W / B W / B

COMPLETER'S N/COMPLETER'S
W / B W / B

TOTALS

3) HOW MANY SEX OFFENDERS REOFFEND WITH THE SAME CRIME BY RACE
AND BY PAROLED & N/PAROLED & OF THESE HOW MANY COMPLETED S.O.P.

PRISON

REFFEND W/S/C
W / B
PAROLED
N/PAROLED

COMPLETED S.O.P.
W / B

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QUESTION:
cont. 3)

<u>PRISON</u>	<u>REOFFEND W/S/C</u>	<u>COMPLETED S.O.P.</u>	<u>TOTAL</u>
	<u>W / B</u>	<u>W / B</u>	
PAROLED			
N/PAROLED			

TOTAL

4) HOW MANY INMATES WERE DENIED PAROLE BASED UPON MISCONDUCTS
WRITTEN BY DEFENDANTS & A TOTAL OF ALL MISCONDUCTS EACH ONE WROTE
BY YEAR.

<u>PRISON</u>	<u>NAME</u>	<u>No. OF MISCONDUCTS</u>	<u>YEAR</u>	<u>RACE - W/B</u>
		DENIED/P		
		TOTAL /ALL		

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QUESTION :

USE ATTACHMENT PAGES IF NECESSARY

5. **HOW MANY OF** THE DEFENDANTS HAVE BEEN ORDER TO ENTER A DRUG OR ALCOHOLIC PROGRAM, NOW OR IN THE PAST.
6. **HOW MANY OF** THE DEFENDANTS HAVE HAD GRIEVANCES WRITTEN AGAINST THEM AND WHAT WERE THEY ABOUT
7. **HOW MANY OF** THE DEFENDANTS WHO HAVE GRIEVANCES WRITTEN AGAINST THEM HAS THE D.O.C. OR THE UNION OR THE COURTS, FOUND GUILTY AND PUNISHED FOR MISTREATING INMATES OR OTHER STAFF MEMBERS
8. **HOW MANY OF** THE DEFENDANTS HAS THE D.O.C. FOUND GUILTY OF ANY MISCONDUCT; WHAT WAS THE MISCONDUCT, AND WHAT WAS THE PUNISH.

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QUESTION:

9) ON WHAT DATE WAS THE STATE POLICE INFORMATION ADDED TO MY FILE AT THE D.O.C. AND THE P.B.P.P.ADDING OTHER CHARGES TO MY RECORD OR CONVICTIONS.

	DATE	BY WHOM	AND WHO REQUEST & REASON
D.O.C.			

P.B.P.P.

10) IN PHILA BY RACE HOW MANY PEOPLE ARE ARRESTED FOR SEXUAL OFFENSE'S HOW MANY ARE CHARGED WITH ASEXUAL OFFENSE AND HOW MANY ARE CONVICTED OF A SEXUAL OFFENSE AND HOW MANY SERVE TIME FOR A SEXUAL OFFENSE ?

	ARRESTED	CHARGED	CONVICTED	SERVE/TIME
WHITE				
BLACK				
TOTAL				

I AFFIRM UNDER PENELTY OF THE LAW THAT THE ABOVE FACTS ARE TRUE TO THE BEST OF MY KNOWLEDGE

DATE _____

NAME _____
TITLE _____
ADDRESS _____
CITY _____ Pa. _____

PROOF OF SERVICE

I, the undersigned, verify that I have served a copy of this petition by U.S. postage paid mail to:

Ms Mosley sup
strawberry sq
Harrisburg Pa.
17120

Rambo J.
~~U.S.D.C.~~
U.S.D.C.M.D.
Penna.

D.O.C. Dr Beard
Po Box 598
champhill Pa.
17041

P.B.P.P.
1101 S front st
Suite 5300
Harrisburg Pa.
17104-2519

Attn: John J. Talaber / m.w. + R.N. Sears
55 utley Drive
camphill Pa. 17011
GOVERNORS office Gen.
COUNSEL

~~ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED~~

NA
I, the undersigned, move this Honorable Court for an order permitting me to proceed In Forma Pauperis. I had previously been granted In Forma Pauperis status. My financial situation has not changed. I am still unable to pay the cost of the said proceedings.

VERIFICATION

I, the undersigned, verify that the above statements are true and correct and that any false statements herein are made subject to Title 18 Pa.C.S.A. section 4904 relating to unsworn falsification to authorities.

Respectfully submitted,

Dated: 5-30-02 ^(6B) 9-16-03

William Branch CF3756

S.C.I. Waymart
P.O. Box 256
Waymart, PA 18472-0256